



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RJN
F#.2011R00633

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 23, 2012

VIA MAIL AND ECF

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Re: United States v. Afrim Kupa, et al.
Criminal Docket No. 11-345 (S-2) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery with respect to the above-referenced case. The government also renews its request for reciprocal discovery.

The following materials are available at First Choice Copy. You may obtain a copy of these materials by contacting Joe Meisner at (718) 381-1480 x212, or jmeisner@nyc.rr.com. Please reference print order number **60121**.

1. Documents and Other Tangible Objects

DX #	Description
27	Photographs of items seized from 30-75 Veterans Road West, Staten Island, New York on 1.30.2012
28	Shipping receipts
29	Laboratory Reports
30	Affidavit in Support of a Search Warrant for Levine's cell phones
31	Affidavit in Support of Search Warrant for Papraniku's cell phones
32	Address book seized pursuant to Joseph Sclafani's arrest on May 2, 2009
33	Redacted report containing statements of defendant Sclafani

2. Consensual Recordings

The following recording was made by a cooperating witness ("CW1") in August 2011. This recording supplements the recordings provided on September 29, 2011 and November 23, 2011.

DX #	Description	Defendant(s)
34	Consensual recording made on 8/3/11	Sclafani

In addition, a recording made by a cooperating witness ("CW2") of L. Kupa will be provided under separate cover.¹

¹ Because of the possibility that this recording, which was made after the indictment of A. Kupa, Levine, Lombardo and Sclafani, could contain information regarding the charges pending against A. Kupa and his co-defendants, the government instituted firewall procedures to ensure that the prosecutors and agents involved in the investigation and prosecution of this matter do not review any portion of the recording pertaining to the indicted defendants' trial or litigation strategy.

If you have any further question or request, please do not hesitate to contact me. The government will supplement this letter as appropriate.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____s/
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Enclosures

CC: Clerk of Court (SLT) (w/o enclosures)